

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

Complaint and Request for Summary Disposition )  
BellSouth Telecommunications, Inc. Against )  
NewSouth Communications Corp., to Enforce )  
Contract Audit Provisions. )  
\_\_\_\_\_ )

Docket No: 040028-TP

Filed April 22, 2004

**MOTION FOR QUALIFIED REPRESENTATIVE TO  
APPEAR ON BEHALF OF NEWSOUTH COMMUNICATIONS CORPORATION**

Pursuant to Rules 28-106.106, 28-106.107 and 28-106.204 of the Florida Administrative Code ("F.A.C.") NewSouth Communications Corp. ("NewSouth"), respectfully moves the Commission to enter an Order designating Catherine Carroll, Esquire, as a Qualified Representative authorized to appear in the above-styled matter on behalf of NewSouth. The grounds for this motion are as follows:

1. Ms. Carroll is admitted to practice law in the State of Maryland and in the District of Columbia and is in good standing with all the Bars in which she is admitted to practice
2. Ms. Carroll has practiced law for approximately five and a half years (in addition to clerking for a federal judge for two years) and is knowledgeable concerning telecommunications law, the nature of these proceedings, and the applicable law. Ms. Carroll is also familiar with the rules of evidence. Ms. Carroll will comply with the standards of conduct set forth in F.A.C. Rule 28-106.107.
3. Ms. Carroll is an associate with Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. and her professional address and telephone number are 701 Pennsylvania Avenue, N.W., Suite 900, Washington, D.C. 20004-2608; (202) 434-7300.
4. NewSouth is aware of the services which Ms. Carroll can and will be performing.

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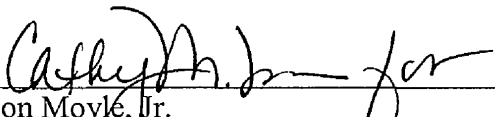
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5. The law firm of Moyle, Flanigan, Katz, Raymond & Sheehan, P.A., in conjunction with having Ms. Carroll authorized to appear in the proceeding as a Qualified Representative, will ensure that New South is well represented in the above-styled matter.

WHEREFORE, NewSouth respectfully requests the entry of an Order authorizing Ms. Carroll to appear in this proceeding as a Qualified Representative for NewSouth Communications Corp.

Respectfully submitted,

**NewSouth Communications Corp.**

  
\_\_\_\_\_  
Jon Moyle, Jr.  
Moyle, Flanigan, Katz, Raymond and  
Sheehan, P.A.  
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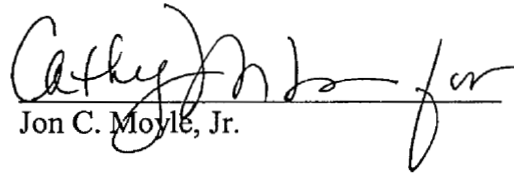
Dated: April 22, 2004

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22<sup>nd</sup> day of April, 2004, a true and correct copy of the foregoing has been furnished by hand delivery\* or by U.S. Mail to the following:

Lee Fordham, Esquire\*  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

R. Douglas Lackey, Esquire  
Nancy B. White, Esquire  
James Meza, III, Esquire  
BellSouth Telecommunications, Inc.  
c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

  
Jon C. Moyle, Jr.